

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JACQUELINE ONOFRE, INDIVIDUALLY  
AND A/N/F OF LUKE ONOFRE and  
HANNAH ONOFRE, MINORS

V.

C.R. ENGLAND, INC. and  
PAUL JOHNSON

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CIVIL ACTION NO. NO: 15-CV-00425-DAE

**DEFENDANTS' DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

C.R. ENGLAND, INC. and PAUL JOHNSON, Defendants in the above-styled and numbered cause, hereby designate the following expert witnesses in accordance with this Honorable Court's Scheduling Order:

**RETAINED EXPERT WITNESSES**

- (1) Richard V. Baratta, Ph.D.  
Rimkus Consulting Group, Inc.  
Eight Greenway Plaza, Suite 500  
Houston, Texas 77046  
(713) 621-3550

Dr. Baratta holds a Ph.D. in biomedical engineering and will provide opinions regarding biomechanics, mechanism of injury, occupant kinematics, impact analysis, and accident reconstruction, among other things. See Dr. Baratta's expert report and Curriculum Vitae (Exhibit "A"), testimony listing (Exhibit "B") and fee schedule (Exhibit "C") attached to this designation. Dr. Baratta's complete file, including his notes, memoranda, diagrams, photographs, radiology films and further exhibits which he expects to use at the trial of this case, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Baratta is presented for deposition.

- (2) **John R. Anderson, M. D.**  
**511 Kreutzberg Road**  
**Boerne, Texas 78006**  
**(830) 446-9733**

Dr. Anderson is Defendants' orthopedic surgeon expert and will provide opinions regarding Plaintiff Jacqueline Onofre's alleged injuries, the diagnoses and treatment provided to Plaintiff Jacqueline Onofre, and the prognosis for Plaintiff Jacqueline Onofre's recovery from her alleged injuries, among other things. See Dr. Anderson's expert report (Exhibit "D"), Curriculum Vitae (Exhibit "E"), testimony listing (Exhibit "F") and fee schedule (Exhibit "G"). Dr. Anderson's complete file, including notes, memoranda, medical records, photographs, radiology films and literature in support of his opinions, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Anderson is presented for deposition.

**NON-RETAINED EXPERT WITNESSES**

- (3) **Deputy R. Gill, ID No. 2943**  
**Bexar County Sheriff's Department**  
**200 North Comal Street**  
**San Antonio, Texas 78207**  
**(210) 335-6300**

Deputy Gill investigated the accident in question. See copy of Deputy Gill's accident investigation report previously produced as CRE-0001 through CRE-0004.

- (4) **Plaintiffs' Medical Providers, as follows –**

**Doctors, Nurses, Technicians, Other Medical Providers**  
**And the Custodian of Records for**  
**Christus Santa Rosa – Westover Hills**  
**11212 Texas Highway 151**  
**San Antonio, Texas 78251**  
**(210) 703-8000**

**Doctors, Nurses, Technicians, Other Medical Providers**  
**And the Custodian of Records for**  
**Family Clinics of San Antonio**  
**11730 West Avenue**  
**San Antonio, Texas 78216**  
**(210) 340-8501**

**Hugo Alonzo Rojas, M. D.  
And the Custodian of Records for  
Family Clinics of San Antonio  
2115 Pleasanton Road, Suite 205  
San Antonio, Texas 78221  
(210) 922-3627**

**Michael Murphy, M. D.  
And the Custodian of Records for  
Consultants in Pain Medicine  
423 Treeline Park  
San Antonio, Texas 78209  
(210) 546-1455**

**Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Medical Center Ophthalmology Associates  
9157 Huebner Road  
San Antonio, Texas 78240  
(210) 267-2020**

**Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
River City Chiropractic – Ingram  
6338 N.W. Loop 410  
San Antonio, Texas 78238  
(210) 682-9696**

**Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Premier Medical Imaging  
11730 West Avenue  
San Antonio, Texas 78216  
(210) 922-0016**

**Michael Leonard, M. D.  
And the Custodian of Records for  
Alamo Neurosurgical Institute  
414 West Sunset Road, Suite 205  
San Antonio, Texas 78209  
(210) 564-8300**

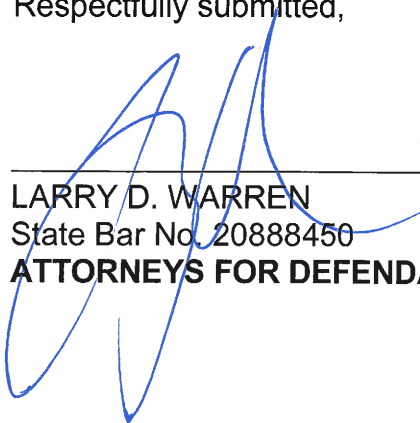
**Cesar Gerez-Martinez, M. D.  
And the Custodian of Records for  
MedFirst Westover Hills Primary Care Clinic  
3903 Wiseman Boulevard, Suite 100  
San Antonio, Texas 78251  
(210) 681-0126**

**Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
San Antonio Military Medical Center  
78234, 3551 Roger Brooke Drive  
San Antonio, Texas 78219  
(210) 916-4342**

**Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Bennett Health Clinic  
761<sup>st</sup> Tank Battalion Avenue  
Fort Hood, Texas 76544  
(254) 618-8039**

**Ricardo A. Riojas, M. D.  
And the Custodian of Records for  
San Antonio Pediatric Associates, P.A.  
9793 Culebra Road, Suite 105  
San Antonio, Texas 78251  
(210) 681-6439**

Respectfully submitted,



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**LARRY D. WARREN**  
State Bar No. 20888450  
**ATTORNEYS FOR DEFENDANTS**

**OF COUNSEL:  
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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been sent on the \_\_\_\_\_ day of December, 2015, to the following:

**F-Filing Notification**

**rwilson@thomasjhenrylaw.com**

Mr. Thomas J. Henry

Mr. Robert P. Wilson

THE LAW OFFICE OF THOMAS J. HENRY

512 Starr Street

Corpus Christi, Texas 78401

**ATTORNEYS FOR PLAINTIFFS**



LARRY D. WARREN